

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>JAMIE L. DAUGHERTY</b>	:	
<b>Debtor</b>	:	<b>CASE NO. 1-19-04047-HWV</b>
	:	
	:	
<b>CARMAX AUTO FINANCE</b>	:	<b>Motion for Relief From Stay</b>
<b>Movant</b>	:	
<b>v.</b>	:	
	:	
<b>JAMIE L. DAUGHERTY</b>	:	
<b>EARL E. ARMSTRONG</b>	:	
<b>CHARLES J. DEHART, III</b>	:	
<b>TRUSTEE,</b>	:	
<b>Respondents</b>	:	

**ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
FILED BY CARMAX AUTO FINANCE**

Comes Now, Debtor, Jamie L. Daugherty, by and through her counsel, Lisa A. Rynard, Esquire, and Answers the Motion for Relief from the Automatic Stay filed by CarMax Auto Finance, as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. A. Admitted.

B. Admitted

C. Neither admitted, nor denied. Debtors are without sufficient knowledge to form a belief as to the truth of paragraph 4C.

D. Admitted. By way of further response, on or about December 7, 2020, Debtor made payments totaling \$5,125.66 on her loan.

5. A. Denied. It is denied that Debtor is failing to make payments under the terms of the retail sales contract and is failing to provide CarMax with adequate protection. Strict proof otherwise is demanded at hearing.

B. Denied. It is denied that the vehicle is uninsured. Debtor will provide documentation. Strict proof otherwise is demanded at hearing.

WHEREFORE, Debtor prays that this Court will enter an Order as follows:

- a. Deny the Motion requesting modification of the automatic stay;
- b. Deny all attorney fees and costs to Movant;
- c. Deny immediate enforcement of an Order granting relief from the Automatic Stay; and
- d. Grant such other relief as is deemed appropriate.

Respectfully submitted,

Purcell, Krug & Haller

By: /s/ Lisa A. Rynard  
Lisa A. Rynard, Esquire  
1719 N. Front Street  
Harrisburg, Pa 17102  
(717) 234-4178  
[lrynard@pkh.com](mailto:lrynard@pkh.com)

Dated: December 14, 2020